

**REMARKS**

In the Office Action dated July 28, 2006, the Examiner rejected claims 1-29 under 35 U.S.C. § 101 as being directed to non-statutory subject matter, rejected claims 1 and 3-29 under 35 U.S.C. § 102(e) as being anticipated by Ludwig et al. (U. S. Patent Publication No. 2003/004874), and rejected claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Ludwig et al. in view of Uehara et al. (U.S. Patent Publication No. 2004/0215572).

By this amendment, Applicants have amended claims 1-7 and claims 8, 14, and 20 to incorporate the subject matter of claims 11, 17, and 23, respectively. Claims 12 and 18 have also been amended to reflect proper antecedent basis. In addition, Applicants have cancelled claims 11, 17, 23, and 26-27. In view of these amendments, claims 1-10, 12-16, 18-22, 24-25, and 28-29 remain pending.

**I. Rejection of claims 1-20 under 35 U.S.C. §101**

The Examiner rejected claims 1-29 as being directed to non-statutory subject matter. Although Applicants disagree with the rejection, Applicants have amended claims 1-7 to recite a "computer readable medium for storing an [the] electronic data record." Furthermore, based on a teleconference with Examiner Saeed on June 11, 2006, it was clarified by the Examiner that claims 20-25 are not rejected under 35 U.S.C. §101. Therefore, Applicants respectfully request the Examiner to withdraw the § 101 rejection of claims 1-10, 12-16, 18-22, 24-25, and 28-29. The rejection of claims 11, 17, 23, and 26-27 is moot, since these claims were cancelled.

**II. Rejection of claims 1 and 3-29 under 35 U.S.C. § 102(b)**

In order for Ludwig et al. to anticipate Applicants' claimed invention under 35 U.S.C. § 102(e), each and every element of the claim at issue must be found, either expressly described or under principles of inherency, in the reference. Further, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2131 (quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989)). Ludwig et al. fails to anticipate the claims because Ludwig et al. does not disclose, expressly or otherwise, each and every feature recited in independent claims 1, 8, 14, and 20.

Amended claims 1, 8, 14, and 20, recite, *inter alia*, "calling one of a plurality of state dependent workflows, wherein the called state dependent workflow depends on the state entered by the user." The Examiner asserts that Ludwig et al. teaches "calling a state dependent workflow" by reference to Figures 6a-6c of Ludwig et al. (Office Action, page 9). Applicants disagree.

Ludwig et al. is directed to an electronic bill presentment and payment system. (Abstract). Figure 6 of Ludwig et al. describes a biller system workflow. [0078]. This workflow is used when "the user logs into the system with the ID of a biller." Id. The system may display a biller system administration page, key biller statistics and a list of "action items" with current counts, amount in local currency and links to corresponding pages, as well as information about the basic functionality of the main topics. Id. The biller system workflow of Ludwig et al., however, is not a "state dependent workflow," but merely a workflow that is used for all types of invoices (closed, open, unpaid and

adjusted) and, moreover, Ludwig et al. does not disclose a “plurality of state dependent workflows” where one of the state dependent workflows is called “depend[ing] on the state entered by the user,” as recited in claims 1, 8, 14, and 20. At most, Ludwig et al. calls a generic biller workflow to process all invoices regardless of the state of each invoice. Therefore, Ludwig et al. fails to teach or suggest “calling one of a plurality of state dependent workflows, wherein the called state dependent workflow depends on the state entered by the user,” as recited in claims 1, 8, 14, and 20.

Applicants, therefore, respectfully request the Examiner to withdraw the 35 U.S.C. § 102(e) rejection of independent claims 1, 8, 14, and 20, as well as claims 2-7, 9-10, 12-13, 15-16, 18-19, 21-22, 24-25, and 28-29, at least due to their dependence from claims 1, 8, 14, and 20 respectively. The rejection of claims 11, 17, 23, and 26-27 is moot, since these claims were cancelled.

### **III. Rejection of claim 2 under 35 U.S.C. § 103(a)**

In order to establish a *prima facie* case of obviousness, three basic criteria must be met. First, the prior art references must teach or suggest all the claim elements. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Third, there must be a reasonable expectation of success. See M.P.E.P. § 2143.

Here, the cited references cannot support a rejection under 35 U.S.C. § 103(a) because, among other things, Ludwig et al. or Uehara et al., taken alone or in any proper combination, do not disclose, teach, or suggest each and every feature recited in independent claim 1.

As noted above, Ludwig et al. does not disclose "calling one of a plurality of state dependent workflows, wherein the called dependent workflow depends on the state entered by the user." Uehara et al. does not overcome this shortcoming of Ludwig et al.

The Examiner cites Uehara et al. for the teaching of "one or more data fields for the characterization of the state." (Office Action, p. 14). However, Uehara et al. does not disclose or suggest "calling one of a plurality of state dependent workflows, wherein the called dependent workflow depends on the state entered by the user," as recited in claim 1. Nor does the Examiner assert that Uehara et al. discloses such features.

Accordingly, Ludwig et al. or Uehara et al., taken alone or in any proper combination, do not teach or suggest each and every feature recited in Applicants' independent claims 1, and, therefore, cannot support a rejection of this claim or claim 2, due to its dependence from claim under 35 U.S.C § 103(a). Accordingly, reconsideration and withdrawal of the rejection is respectfully requested and deemed appropriate.

### **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants submit that the claims are neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants, therefore, request the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.


Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

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Respectfully submitted,

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